

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT KOLINEK, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WALGREEN CO., an Illinois corporation,

Defendant.

Case No. 1:13-cv-4806

Honorable Matthew F. Kennelly

**PARTIES' JOINT STATUS REPORT AND
REQUEST FOR CONTINUANCE OF STATUS CONFERENCE**

Plaintiff Robert Kolinek and Defendant Walgreen Co. ("Walgreens" and collectively, the "Parties"), respectfully submit this Joint Status Report to inform the Court of the status of this case since the last case management conference held on September 3, 2014. The Parties wish to report that after engaging in a private mediation session before the Honorable Wayne R. Andersen (ret.) of JAMS on October 15, 2014, and additional settlement discussions thereafter, they have reached an agreement in principle for a proposed class action settlement of this matter, subject to finalizing and executing a formal settlement agreement and approval of the Court.

With Judge Andersen's continuing assistance, the Parties are in the process of negotiating the remaining details of the proposed settlement, including certain injunctive relief that will be part of any final agreement. Furthermore, the Parties have also agreed that, as part of the settlement, they will be exchanging confirmatory discovery, which they anticipate will be completed within ninety (90) days. After completion of such confirmatory discovery, Plaintiff

will be in a position to move the Court for preliminary approval of the proposed settlement. As such, the Parties request that the Court set January 30, 2015 as the deadline to do so.¹

Additionally, and in light of a scheduling conflict Plaintiff's counsel has with another matter, the Parties respectfully request a two (2) day continuance of the status conference currently set for November 12, 2014 at 9:00 a.m., to November 14, 2014 at 9:00 a.m., if the Court is available at that time.

Respectfully submitted,

ROBERT KOLINEK, individually and on behalf
of all others similarly situated,

Dated: November 10, 2014

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

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WALGREEN CO.,

Dated: November 10, 2014

By: /s/ Bradley J. Andreozzi
One of Defendant's Attorneys

¹ Although the Parties are confident that they would otherwise be able to finalize the settlement within sixty days, given the upcoming holiday season and potential delays that may result, they believe that an additional few weeks' time will ensure the thoroughness of their settlement efforts.

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CERTIFICATE OF SERVICE

I, Benjamin H. Richman, an attorney, hereby certify that on November 10, 2014, I served the above and foregoing ***Parties' Joint Status Report and Request for Continuance of Status Conference***, by causing a true and accurate copy of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system, on this the 10th day of November 2014.

/s/ Benjamin H. Richman